

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Dionte Young)	
)	
Plaintiff,)	Case No: 17-cv-01914
)	
v.)	Judge Sarah L. Ellis
)	
Cook County Sherriff Office et al.,)	
)	
Defendants.)	

NOTICE OF MOTION

TO: (See Attached Certificate of Service)

PLEASE TAKE NOTICE that on Thursday, May 10th, 2018, at 1:45 p.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Judge Sara L. Ellis and shall then and there present, **Plaintiff's Verified Second Motion To Extend Time To File Plaintiff's Amended Complaint**, which was filed electronically with the Court and is available through the Court's system.

Dated: May 8, 2018

Respectfully submitted,

By: /s/ E. Glenn Rippie
E. Glenn Rippie, Attorney for Plaintiff

E. Glenn Rippie
Jacqueline M. Vidmar
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CERTIFICATE OF SERVICE

Pursuant to Rule 5 of the Federal Rules of Civil Procedures, the undersigned, an attorney, hereby certify that I caused a copy of the above Notice of Motion and Plaintiff's Verified Second Motion To Extend Time To File Plaintiff's Amended Complaint to be served upon all parties listed on the service list below by electronic means pursuant to Electronic Case Filing (ECF) and by placing a copy of the same in an envelope, properly addressed, with proper postage affixed thereon, and depositing said envelope in the U.S. mail box located at 222 W. Merchandise Mart Plaza, Chicago, Illinois 60654 prior to 5:00 p.m. on this 8th day of May, 2018.

/s/ E. Glenn Rippie

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Cook County Jail
50 Washington, Room 704
Chicago, Illinois 60602

Cook County Sheriff's Office
50 Washington, Room 704
Chicago, Illinois 60602

Dionte Young, #K-83209
Sheridan Correctional Center
4017 E. 2603 Road
Sheridan, Illinois 60551

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**PLAINTIFF’S VERIFIED SECOND MOTION TO EXTEND TIME
TO FILE PLAINTIFF’S AMENDED COMPLAINT**

Now comes Plaintiff, Dionte Young, by and through his attorneys, Rooney Rippie & Ratnaswamy, LLP, and respectfully requests for an extension of time within which to file Plaintiff’s Amended Complaint, stating as follows:

1. On February 7, 2018, this Court appointed E. Glenn Rippie of Rooney Rippie & Ratnaswamy, LLP as Plaintiff’s counsel in the instant proceeding. The Court further set April 13, 2018, as the date by which an amended complaint naming a proper Defendant(s) and curing other pleading deficiencies should be filed.

2. On April 9, 2018, Plaintiff and his counsel filed a Motion to Extend Time to File Plaintiff’s Amended Complaint (the “Motion”) to facilitate Counsel’s ongoing investigation of the relevant facts, including coordinating an on-site meeting with Plaintiff. On April 12, 2018, this Court granted Plaintiff’s Motion, extending the date by which an amended complaint should be filed to May 11, 2018.

3. In addition to concluding its pre-filing investigation, counsel is arranging to again visit the correctional facility to which Plaintiff is assigned, including for the purpose of

reviewing with Plaintiff, in person, the proposed Amended Complaint. This visit is being scheduled with the Illinois Department of Corrections to occur on May 16, 2018.

4. A fourteen day extension is requested in in order to allow these steps to be completed and to complete the aforementioned meeting with Plaintiff and counsel. This Motion is made in good faith for purposes of necessity, and only in order to obtain additional time to complete and file Plaintiff's Amended Complaint, and not for purposes of delay.

5. Other than Plaintiff's counsel, no appearances have been filed in this matter.

6. Plaintiff's counsel verifies this motion pursuant to the Certification hereto.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order extending the time to file Plaintiff's Amended Complaint by fourteen (14) days to May 25, 2018, and grant such other further relief as this Court may deem fair, just, and proper.

Dated: May 8, 2018

Respectfully submitted,

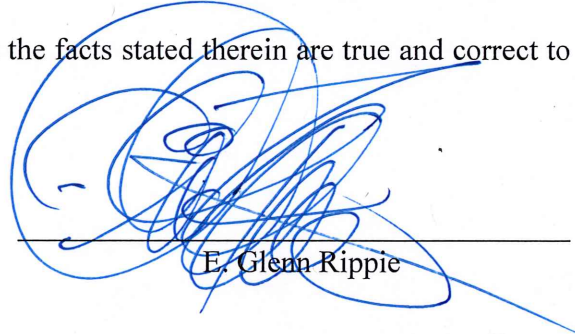
By: /s/ E. Glenn Rippie
E. Glenn Rippie, Attorney for Plaintiff

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STATE OF ILLINOIS)
)
COUNTY OF COOK) ss.

VERIFICATION

E. Glenn Rippie, being first duly sworn, states that he is an attorney, that he has read the foregoing Verified Second Motion to Extend Time to File Amended Complaint, that he is knowledgeable of the facts stated therein, and that the facts stated therein are true and correct to the best of his information and belief.



E. Glenn Rippie

Subscribed and sworn to before me
this 8th day of May, 2018



Notary Public

